

THE LAW OFFICE OF  
**JAMES A. SCHIFF, ESQ.**  
521 FIFTH AVENUE  
17<sup>TH</sup> FL.  
NEW YORK, NY 10175

JAMES A. SCHIFF

MEMBER OF THE NEW YORK  
FEDERAL AND STATE BARS

P (212) 362-5600  
F (212) 260-6918  
jschiff@schiffesq.com

December 15, 2022

**BAIL MODIFICATION REQUEST**  
**VIA ECF**

Hon. J. Paul Oetken  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *United States v. Tomas Deleon*, 22 Cr. 280 (JPO), Request to Remove  
Electronic Monitoring

Dear Judge Oetken:

I represent Tomas Deleon in the above-referenced matter, and I write to respectfully request that the Court modify Mr. Deleon's bail conditions by removing the electronic monitoring condition of the bond. On April 19, 2022, Mr. Deleon was released pursuant to a personal recognizance bond on his own signature with several other conditions including electronic monitoring. Mr. Deleon suffers from diabetes and other medical conditions that require frequent doctor visits. Furthermore, the diabetes causes ankle inflammation which creates additional and significant discomfort from wearing an ankle monitor bracelet.

I discussed this matter with Officer Harrison from Pretrial Services who supervises Mr. Deleon. Officer Harrison confirmed that Mr. Deleon has been abiding by all the conditions of his release and believes that further electronic monitoring is not required to ensure Mr. Deleon returns to court. I addressed this issue with AUSA Burnett who advised that the Government defers to Pretrial Services regarding this issue. Therefore, as neither Pretrial Services nor the Government object, we respectfully ask that the Court remove the electronic monitoring condition of Mr. Deleon's release.

We thank the Court for entertaining our request.

Respectfully,

/s/ James Schiff

*Attorney for Defendant*  
(212) 362-5600

cc: Thomas Somerset Burnett, AUSA (via ECF)

Granted.  
So ordered.  
12/19/2022



---

J. PAUL OETKEN  
United States District Judge